AUG 3 0 1988

Mr. Bruce Lee Jernigan Divisional Vice President CERCLA Activities Browning-Ferris Industries P.O. Box 3151 Houston, Texas 77253

Re: Browning-Ferris Industries
Ponce, Puerto Rico
EPA I.D. Number: PRD980594709

Dear Mr. Jernigan:

The Environmental Protection Agency (EPA) has reviewed both the June 29 and August 11, 1988 submittals regarding the protective filing request for the Ponce Municipal Landfill Cell #1. EPA has determined, based on the evidence submitted, that the Landfill Cell #1 was never used to treat, store, or dispose of any hazardous waste. In addition, the evidence submitted (e.g., aerial photographs and boring logs) showed that the land was virgin terrain and never disturbed before November 1983, at which time construction operations commenced for Landfill Cell #1. Since a Part A application was submitted for the facility including Landfill Cell #1, interim status was granted. Therefore, in order to reclassify this unit, complete background documentation had to be provided. BFI has submitted to the Agency all the necessary documents required for this determination. A revised Part A application must now be submitted deleting this unit. The only unit which should be listed in the revised Part A application is the co-disposal area which is currently undergoing closure.

In addition, EPA is currently reviewing the July 22, 1988 co-disposal investigation workplan. This investigation, along with past submittals should be used in the development of the post-closure permit application. As a reminder, your post-closure permit application is due to the Agency on January 12, 1989. We are available to discuss any problems you may encounter in the development of your application.

Should you have any questions, please contact Douglas Pocze, of my staff, at (212) 264-8690.

Sincerely yours,

Stanley Siegel, Chief Hazardous Waste Facilities Branch

cc: Marina Bouley, BFI
Jose Cepeda, Goldman and Antonetti
Randy Sullivan, Golder Associates, Inc.

bcc: Douglas Pocze, 2AWM-HWF
Stephen Knight, 2AWM-HWF
Stanley Siegel, 2AWM-HWF
Angel Chang, 2AWM-HWF
Laura Livingston, 2PAB
John Gorman, 2AWM-HWF
Amy Chester, 2ORC



REQUEST FOR PROTECTION
FILING STATUS ON CELL #1
PONCE MUNICIPAL LANDFILL
EPA ID# PRD 980-594-790

CA 88-08/12/88

25

Submitted to:

Stanley Siegel, Chief
Hazardous Waste Facilities Branch
U.S. Environmental Protection Agency
Region II - 26 Federal Plaza
New York, New York 10278

DISTRIBUTION:

3 Copies - U.S. EPA

2 Copies - BFI of Ponce

2 Copies - Golder Associates Inc.

August 1988

883-3643



August 12, 1988

883-3643

Stanley Siegel, Chief Hazardous Waste Facilities Branch U.S. Environmental Protection Agency Region II - 26 Federal Plaza New York, New York

REQUEST FOR PROTECTIVE FILING STATUS ON CELL #1 PONCE MUNICIPAL LANDFILL EPA ID# PRD 980-594-790

Dear Mr. Siegel:

We are writing at the request of BFI of Ponce, Inc. (BFIP) in response to your July 25, 1988 letter to J. Cepeda. Responses to specific items in the letter are provided below. Three copies of the letter and enclosures are enclosed, as requested by Doug Pocze.

Paragraph 2 of your letter requested that aerial photography of Cell #1 be submitted along with supporting descriptions of the photography. In response, three photographs and a drawing depicting the site are included as Enclosures 1 through 4. All the photographs identify the location of Cell #1 and include a north arrow. Enclosure 1 is a vertical photograph (1 to 8200 scale) taken on March 23, 1983, which depicts the site property boundaries. Enclosure 2 is Law Engineering's interpretation of Enclosure 1, which was submitted as part of the Part B Permit Application on May 25, 1984. Enclosure 3 is a vertical photograph (1 to 7200 scale) of the site taken on February 9, 1988. Enclosure 4 is an oblique photograph (1 to 4400 scale) of the site taken on May 18, 1988.

Regarding Paragraph 3 of your letter, BFIP wishes to clarify Rick Good's affidavit with regards to the distance between Cell #1 and the nearest waste. Borings C-33 and C-40 (Enclosures 5 and 6), both located approximately 25m (80 ft.) from the top of the inside slope of Cell #1, are the closest borings which encountered landfill waste materials Enclosure 7, Location of Soil Borings; Ref.: Golder Associates Inc., Hydrogeologic Review, July, 1988). Enclosure 8, Summary of Borings, a table previously submitted on November 3, 1983 by Law Engineering Testing Co. in Geotechnical Exploration Final Report, indicates thicknesses of 9 and >2.5 feet for borings C-33 and C-40, respectively.

GOLDER ASSOCIATES, INC. • 3730 CHAMBLEE TUCKER ROAD • ATLANTA, GA 30341 • TELEPHONE: (404) 496-1893 • TELEX 700

OFFICES IN LINITED STATES = 0.0000

Paragraph 4 of your letter requested further explanation of BFIP's conclusion that no waste was present at the locations of C-41, C-42, C-44, C-50, C-65 and C-67. An examination of the borehole log descriptions for these boreholes indicates that residual soils (i.e., soils which have been formed in-place due to weathering/decomposition of the parent bedrock) were encountered from the ground surface to boring termination (Enclosures 9 through 14, respectively). The presence of the residual soils, as opposed to fill or waste, indicates no waste had been placed at the borehole locations. Consequently, deeper drilling was not required. In addition, borings C-39, C-84, C-85 and C-87 (Enclosures 15 through 18, respectively), which are adjacent to Cell #1, indicate no waste has been placed at the borehole locations.

Paragraph 5 requested the submittal of dated construction diagrams and/or well boring logs for MW-7 or C-88. Boring logs for both of these boreholes are included as Enclosures 19 and 20 for your review.

Please feel free to contact us if additional information is needed or if we can be of help in any way.

Very truly yours,

GOLDER ASSOCIATES INC.

tett D. Thomas

Scott D. Sumner

Geological Engineer

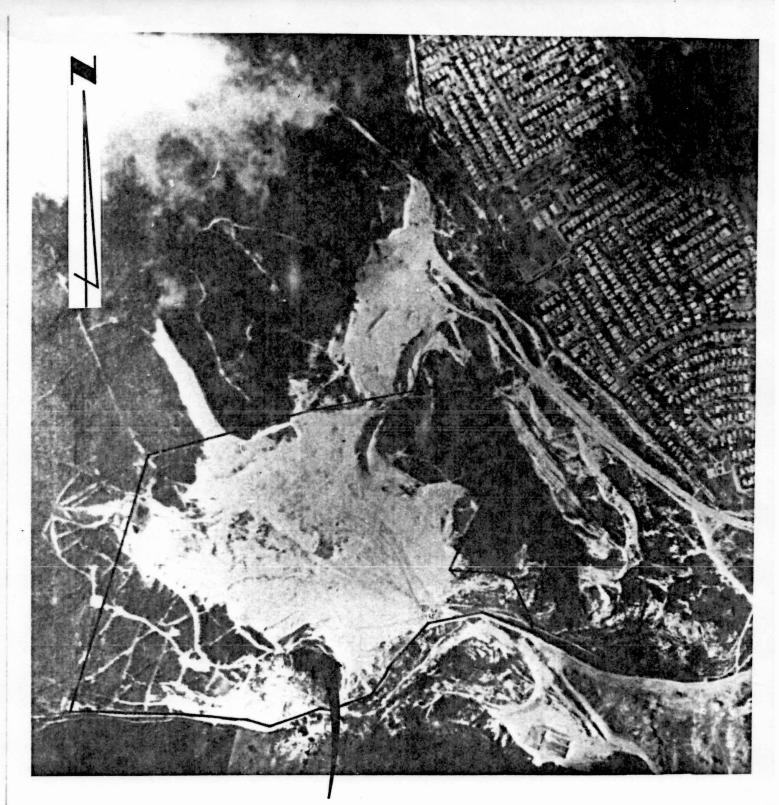
W. R. Sullwan V. Randall Sullivan, P.E.

Associate

SDS:WRS:rcs

Enclosures

cc: Douglas Pocze w/o enclosures Marina Bouley Bruce Jernigan w/o enclosures Jose Cepeda



APPROXIMATE LOCATION OF FUTURE CELL #1

Date of Photo:

3-23-83

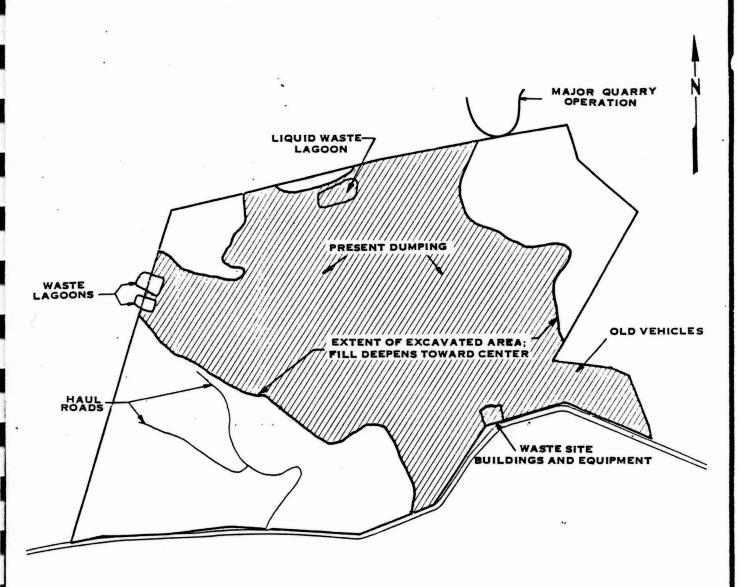
Photo No:

244-13

Figure No:

A-7b

ENCLOSURE 1



NOTES:

- CONTINUED EXPANISION OF QUARRYING AND AND DUMPING OPERATIONS
- ESTABLISHMENT OF SITE BUILDING AND EQUIPMENT CENTER

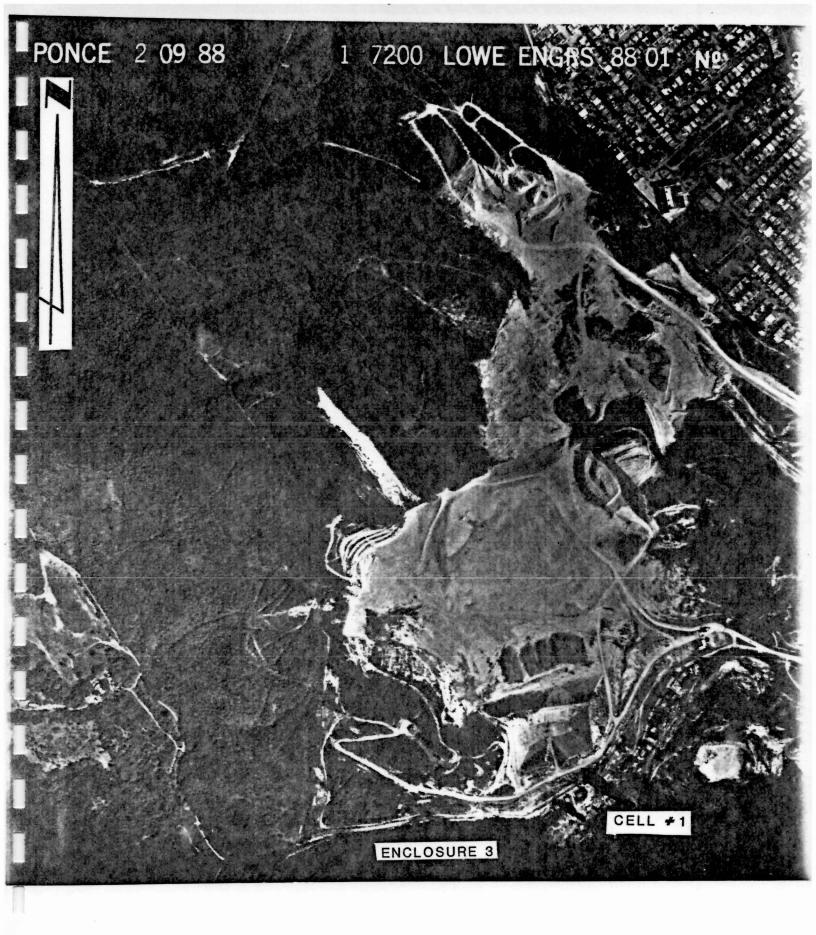
URF 2 0 200 400

ENCLOSURE 2



180 METERS

600 FEET



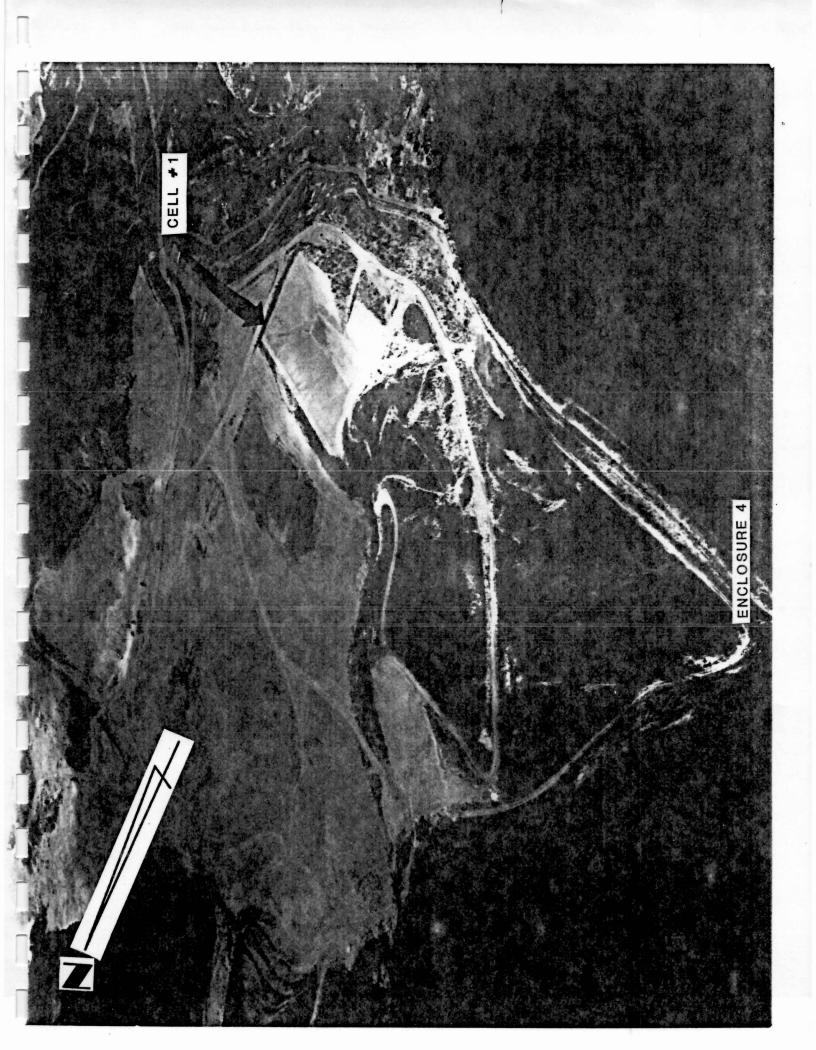
SUMMARY OF BORINGS

BOR	RING NUMBER	THICKNESS OF WASTE (FT)	TOTAL DEPTH OF BORING
	C-22	9.0	13.5
	C-23	21.0	30.0
	C-24	7.0	13.5
	C-25	13.0	18.0
	C-26	18.0	24.0
	C-27	14.5	19.0
	C-28	26.5	30.5
	C-29	9.0	15.5
	C-30	6.5	13.5
	C-31	4.0	5.0
	C-32	19.5	25.5
	C-33	9.0	15.5
	C-34	13.0	20.0
÷	C-35	>2.5	2.5
	C-36	>4.0	4.0
	C-37	14.0	15.5
	C-38	7.5	10.5
	C-39	-0-	5.5
	C-40	>2.5	2.5
	C-41	-0-	4.5
	C-42	-0-	4.5
	C-43	3.5	8.5
	C-44	-0-	5.5
	C-45	17.0	23.5
	C-46	48.0	54.5
	C-47	5.5	10.0
	C-48	25.0	30.5
	C-49	13.0	19.5
	C-50	-0-	5.0

SUMMARY OF BORINGS

(CONTINUED)

BORING NUMBER	THICKNESS OF WASTE (FT)	TOTAL DEPTH OF BORING
C-51	1.5	5.5
C-52	Not Drilled	•.•
C-53	53.0	60.5
C-54	54.0	70.5
C-55	51.0	60.5
C-56	39.0	45.5
C-57	Not Drilled	
C-58	27.5	40.5
C-59	>6.0	6.0
C-59A	49.0	65.5
C-60	41.0	50.5
C-61	17.0	30.5
C-62	>13.0	13.0
C-62A	24.5	40.5
C-63	30.0	40.5
C-64	28.5	34.8
C-65	-0-	15.0
C-66 .	13.0	25.0
C-67	-0-	10.0
C-68	Not Drilled	
C-69 -	Not Drilled	
C-70	Not Drilled	
C-71	4.0	14.8
C-72	13.5	20.5
C-73	15.5	24.8
C-74	28.0	35.5
C-75	22.0	29.1
C-76	9.0	15.0
C-77	17.5	25.5
C-78	14.6	20.4
C-79	Not Drilled	
C-80	Not Drilled	



TEST BORING RECORD

ELEV.(FT.)	DEPTH FEET	DESCRIPTION F	ORMATION	PENETRATION BLOWS PER FOOT
259.4	3.0	FILL - YELLOW ORANGE FINE TO MEDIUM SANDY SILT AND ROCK FRAGMENTS. FILL - WASTE MIXED WITH GRAY AND BROWN FINE SANDY SILTY CLAY. EXPLOSIVE GASES PRESENT.	FILL	
249.4	9.0	RESIDUAL - HARD TO VERY HARD PALE YELLOW ORANGE FINE SANDY SILTY CLAY TOP 18 INCHES STAINED GRAY AND DARK GRAY.	1 1 1	
244.4	15.5	BORING TERMINATED AT 15.5 FEET.		
239.4				
		×		

REMARKS:

SURFACE ELEVATION=79.1 METERS BORING GROUTED TO GROUND SURFACE ON COMPLETION

DRILLED BY _	CST
LOGGED BY _	BLJ
CHECKED BY_	RAC

BORING NUMBER	C-33
DATE STARTED	5-20-83
DATE COMPLETED	5-20-83
IOR NUMBER	GS 3223

TEST BORING RECORD

BLEV.(FR	DEPTH FEET	DESCRIPTION FO	RMATI	ON	U		ATION BLC	100T	00
231.8		FILL - PALE YELLOW ORANGE FINE TO MEDIUM SANDY SILT AND ROCK FRAGMENTS WASTE AT 2.0 FEET. BORING TERMINATED AT 2.5 FEET.	FILL						
226.8				.					
		·							
		•	_		-				
						İ			
						and received the second and the other cases			
						The section of the se			
						The second secon			

REMARKS:

SURFACE ELEVATION=70.7 METERS BORING GROUTED TO GROUND

SURFACE ON COMPLETION

DRILLED BY	CST
LOGGED BY	BLJ
CHECKED BY	RAC
CHECKED DI	

BORING NUMBER	C-40
DATE STARTED	5-23-83
DATE COMPLETED	5-23-83
JOB NUMBER	GS3223

SUMMARY OF BORINGS (CONTINUED)

BORING NUMBER	THICKNESS OF WASTE (FT)	TOTAL DEPTH OF BORING
C-81	29.0	35.5
C-82	7.0	15.5
C-83	6.0	15.25
C-84	-0-	30.0
C-85	-0-	28.5
C-86.	Not Drilled	
C-87	-0-	80.5

TEST BORING RECORD

ELEV.(FT)	DEPTH FEET	DESCRIPTION	FORMATION	PENETRATION BLOWS PER FOUT 5 10 15 20 30 40 60 60 100
220.2		RESIDUAL - VERY DENSE PALE YELLOW ORANGE SILTY CLAYEY FINE SAND.	JUANA DIAZ	
215.2	4.5	BORING TERMINATED AT 4.5 FEET.		60/6"
			*	

REMARKS:

SURFACE ELEVATION=67.1 METERS BORING GROUTED TO GROUND SURFACE ON COMPLETION

DRILLED BY _	CST
LOGGED BY _	BLJ
CHECKED BY	RAC

BORING NUMBER	C-41
DATE STARTED	5-23-83
DATE COMPLETED	5-23-93
IOR NUMBER	G53223

TEST BORING RECORD

ELEV.(FT)	DEPTH FEET	DESCRIPTION	FORMATION	PENETRATION-BLOWS PER FOOT U 5 10 15 20 30 40 60 60 100
218.8		RESIDUAL - PALE YELLOW ORANGE SILTY CLAYEY FINE SAND.	JUANA	
213.8	4.5	BORING TERMINATED AT 4.5 FEET.		• 6"
		ā.		

REMARKS:

SURFACE ELEVATION=66.7 METERS BORING GROUTED TO GROUED SURFACE ON COMPLETION

DRILLED BY	CST
LOGGED BY	BIJ
CHECKED BY	PAC

BORING NUMBER	C-42
	5-23-83
DATE COMPLETED	5-23-83
IOR NUMBER	CS3223

TEST BORING RECORD

ELEV.(FT)	DEPTH FEET	DESCRIPTION FO	DRMAT	101		ETRA					100
267.1		RESIDUAL - HARD PALE YELLOW ORANGE SLIGHTLY FINE SANDY SILTY CLAY.									
252			JUANA								
262.1							_ _			Щ	1
5	5.5	BORING TERMINATED AT 5.5 FEET.									
257.1											
		•									
			.4)								
							1			П	1
						7					
				1							
										T	
							+	-	H	+	
			×								

REMARKS:

SURFACE ELEVATION=81.4 METERS BORING GROUTED TO GROUND SURFACE ON COMPLETION

DRILLED BY _	CST
LOGGED BY	BLJ
CHECKED BY	RAC

BORING NUMBER	C-44
DATE STARTED	5-24-83
DATE COMPLETED	5-24-33
JOB NUMBER	GS3223

ENCLOSURE 12 TEST BORING RECORD

LEV.(FT)	PEET	DESCRIPTION	FORMATION	PI V	5 10 1	5 20 30 40	R FOOT
186.3		RESIDUAL - VERY HARD PALE YELLOW					
		ORANGE FINE SANDY SILTY CLAY.					
			Z				
			JUANA	1 1			
181.3			20				
101.5	5.0	BORING TERMINATED AT 5.0 FEET.	\neg		1-1-		
		BORING TERMINATED AT 5.0 FEET.					
				1 1			
					+		11111
		· .					
				l	++		+++++
					1 1		
					+	+++	\Box
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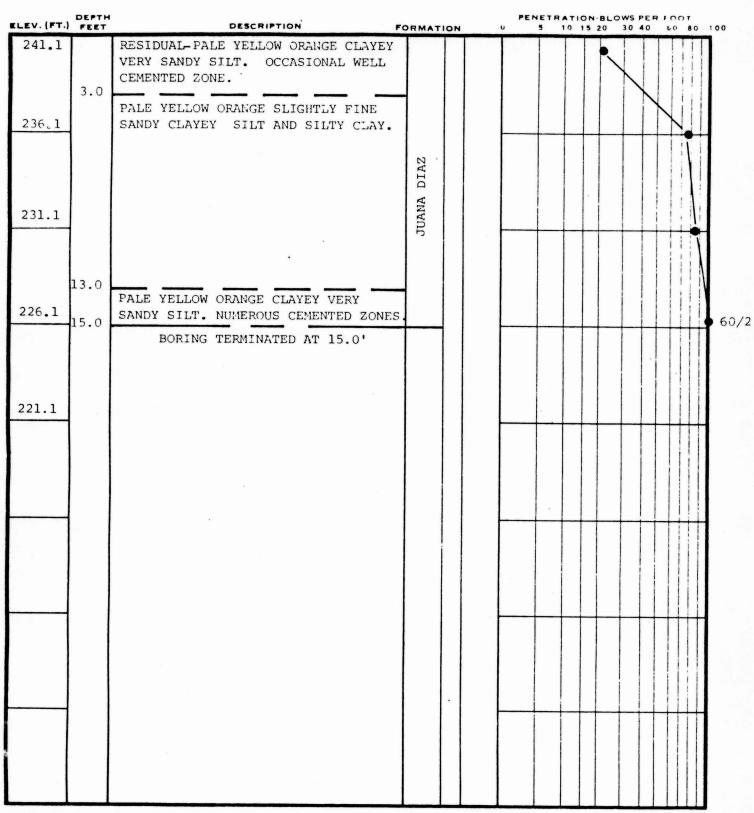
REMARKS:

SURFACE ELEVATION=56.8 METERS BORING GROUTED TO GROUND SURFACE ON COMPLETION

DRILLED BY	CST
LOGGED BY	BLJ
CHECKED BY	RAC

BORING NUMBER	C=50
DATE STARTED	5-27-83
DATE COMPLETED	5-27-83
IOB NUMBER	GS 3 2 2 3

ENCLOSURE 13 TEST BORING RECORD



REMARKS:

Elevation = 73.5 meters
(The elevation of this boring was scaled from topographic map.)

Boring grouted to ground surface on completion.

DRILLED BY _	CJT
LOGGED BY	BLJ
CHECKED BY	LDW

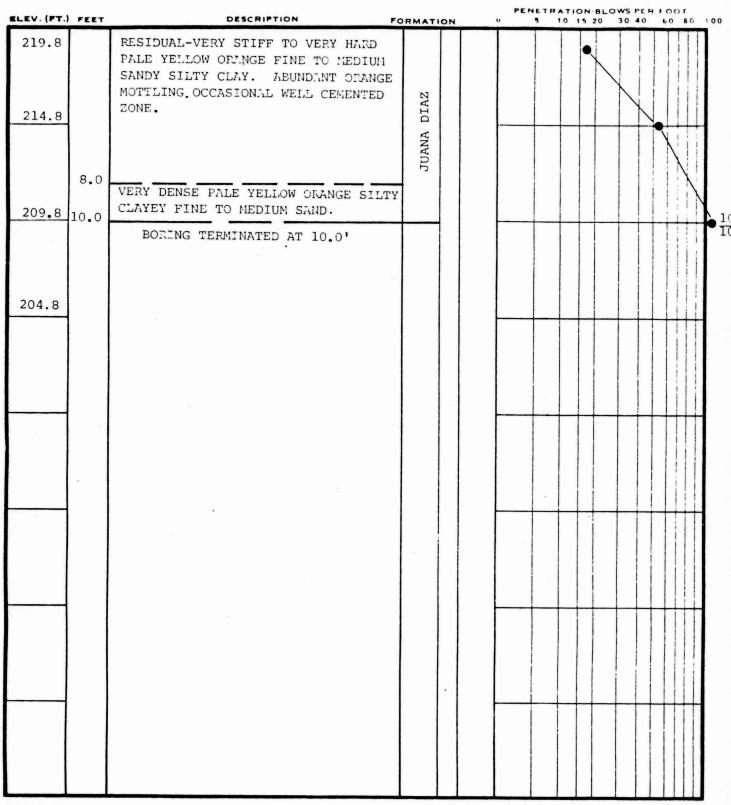
 BORING NUMBER
 C-65

 DATE STARTED
 7-26-83

 DATE COMPLETED
 7-26-83

 JOB NUMBER
 GS3223

ENCLOSURE 14 TEST BORING RECORD



REMARKS:

Elevation = 67.0 meters (The elevation of this boring was scaled from topographic map)

Boring grouted to ground surface on completion

DRILLED BY	AQ
LOGGED BY	RAC
CHECKED BY	LDW

BORING NUMBER	C-67
DATE STARTED	7-7-83
DATE COMPLETED	7-7-83
JOB NUMBER	GS 3223

TEST BORING RECORD

ELEV1FT)	DEPTH FEET	DESCRIPTION F	ORMAT	ION	PENETRATION BLOWS P	
233.2		RESIDUAL - VERY HARD PALE YELLOW ORANGE CLAYEY FINE SANDY SILTY CLAY				1 1
		BLACK STAINING ON JOINT SURFACE.				
			JUANA			
228.2	*		JU TO			
	5.5		-			
		BORING TERMINATED AT 5.5 FEET.				
223.2						
		•				
			'			
					i III i	
		*				111
		,				
						illill

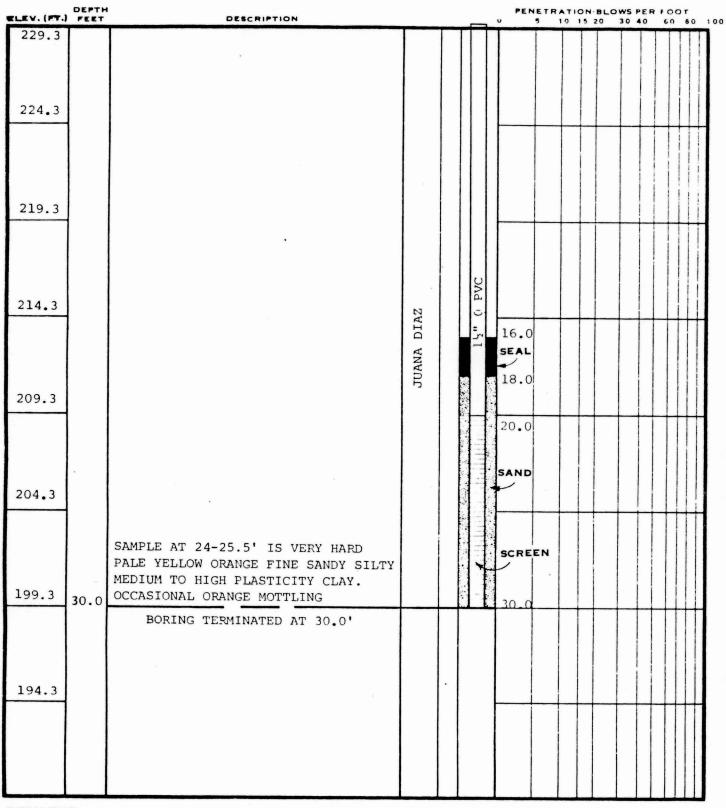
REMARKS:

SURFACE ELEVATION=71.1 METERS BORING GROUTED TO GROUND SURFACE ON COMPLETION

DRILLED BY _	CST
LOGGED BY _	RI.I
CHECKED BY	RAC

BORING NUMBER	C-39
DATE STARTED	5-23-83
DATE COMPLETED	5-23-83
JOB NUMBER	GS 3223

TEST BORING RECORD



REMARKS:

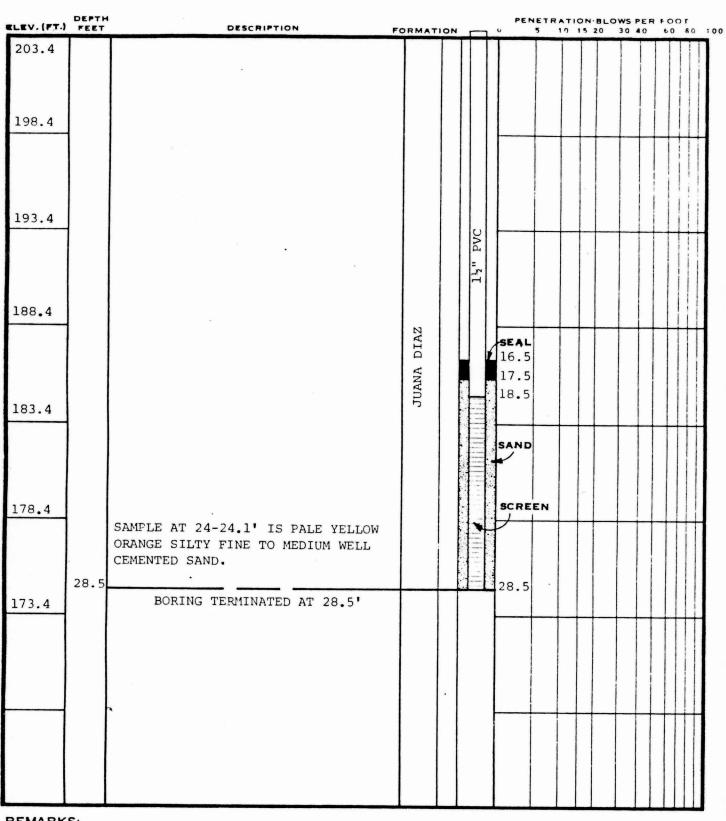
Elevation = 69.9 meters (The elevation of this boring was scaled from topographic map)

Bit: 2-7/8 inch Tricone
Drilling Fluid: Water
Screen slotted by field
engineer using a hacksaw

DRILLED BY	QA	
LOGGED BY	RAC	
CHECKED BY	LDW	

BORING NUMBER .	C-84
DATE STARTED	7-12-
DATE COMPLETED	7-14-
JOB NUMBER	GS322

TEST BORING RECORD



REMARKS:

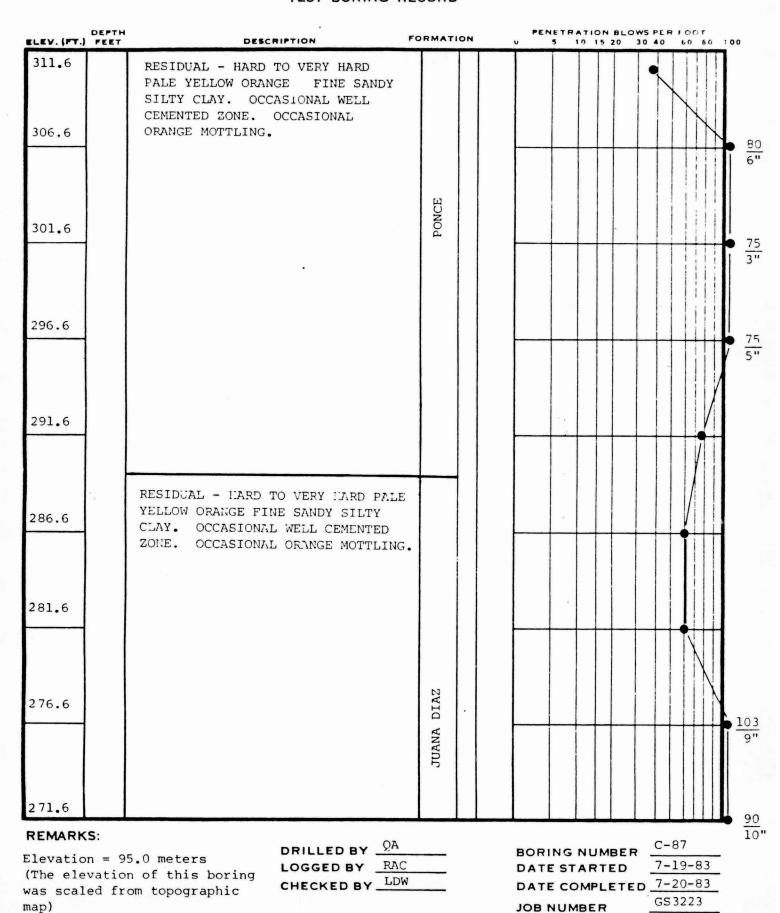
Elevation = 62.0 meters (The elevation of this boring was scaled from topographic map)

Bit: 2-7/8 inch Tricone Drilling Fluid: Water Screen slotted by field engineer using a hacksaw

DRILLED BY	QA
LOGGED BY	RAC
CHECKED BY	LDW

BORING NUMBER	C-85
DATE STARTED	7-14-83
DATE COMPLETED	7-14-83
JOB NUMBER	GS3223

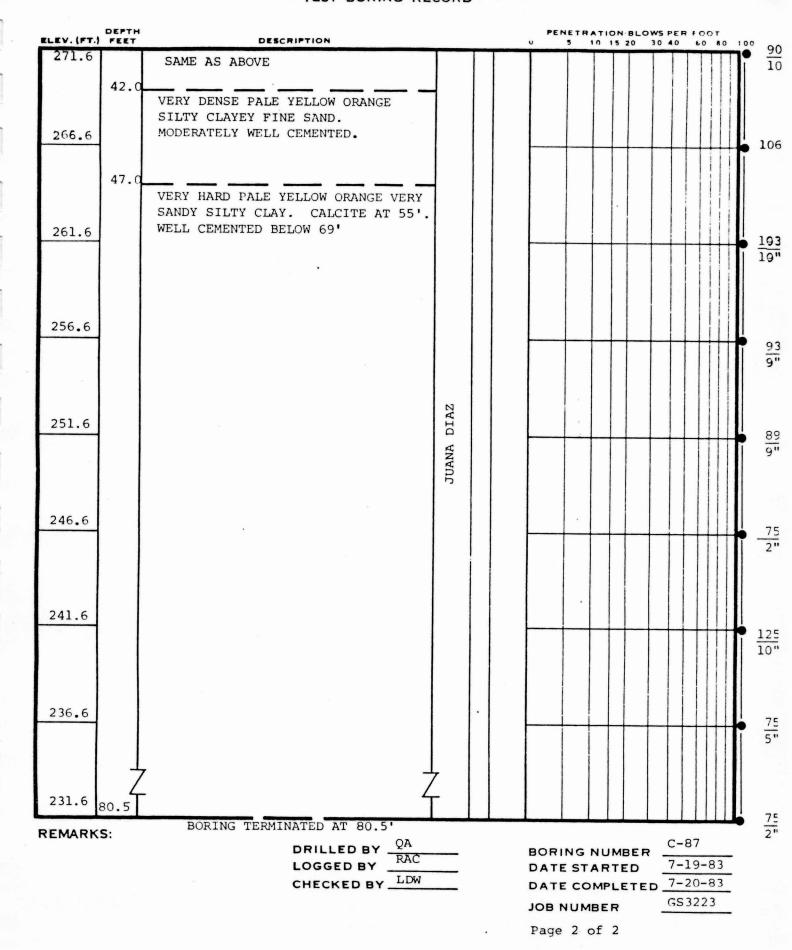
TEST BORING RECORD

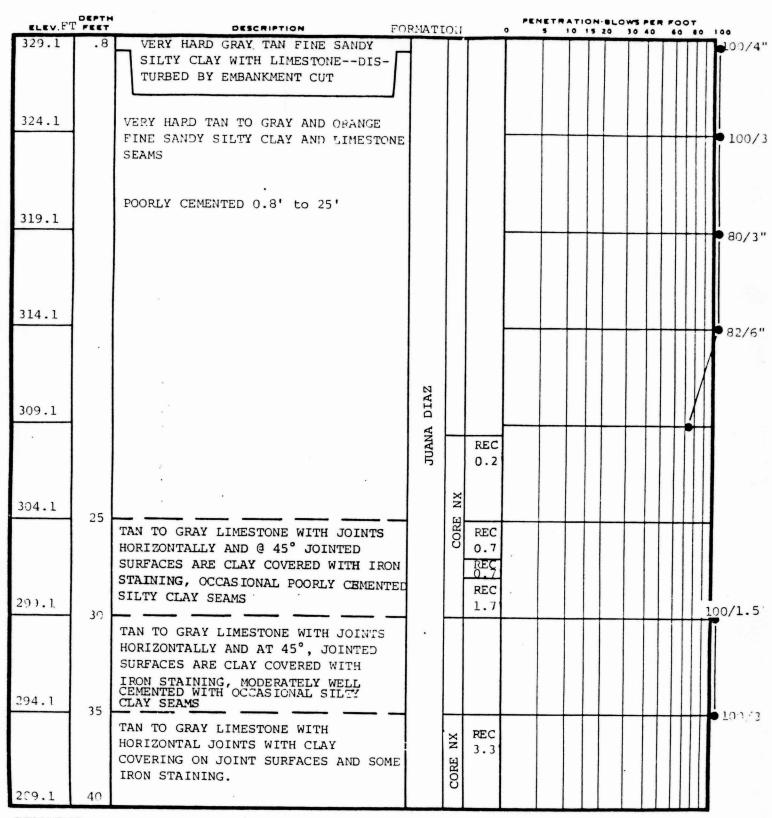


Page 1 of 2

Boring grouted to ground

surface on completion.





REMARKS:

Coordinates

N: 19,297.66 M

E: 128,378.27 M

DRILLED BY Caribbean ST
LOGGED BY MJC
CHECKED BY LDW

Drilled with air between depths 0 to 75'.

Drilled with water between depths 75' to 102'.

Boring grouted to surface upon completion.

BORING NUMBER C-88

DATE STARTED 3/15/84

DATE COMPLETED3/19/84

JOB NUMBER GS 3223.55

	TAN TO GRAY LIMESTONE WITH HORI- ZONTAL JOINTS WITH CLAY COVERING						1	7	777	
284 1	ON JOINT SURFACES AND SOME IRON STAINING		CORE NX	REC 2.2'						
45	VERY HARD TAN FINE SANDY SILTY CLAY POORLY CEMENTED, WITH LIMESTONE FRAGMENTS									90/5"
279.1										75/5"
274.1										9 75/3"
269.1	· ·	A DIAZ			,					- 75/6"
	VERY HARD FINE SANDY SILTY CLAY AND LIMESTONE WITH SOME IRON STAINING	JUANA								
150.1			CORE NX	REC 2.2'						30 A
259.1										
254.1	•									
249.1 30 REMARKS:	Carib							-88		. 1

DRILLED BY

LOGGED BY MJC

CHECKED BY LOW

JOB NUMBER

BORING NUMBER

DATE COMPLETED 3/19/84

DATE STARTED

3/15/84

GS 3223.55

Page 2 of 3

CLEV.FT	PEET	DESCRIPTION	FOF	MATI	011		ETRA1	10N	 20	WS P		00	T 80	10
249.1	80	TAN LIMESTONE WITH JOINT PLANES 450												
244.1				띩	L	_		-	_		+	\coprod	\coprod	
		•		CORE	NX	REC 0.1'								
239.1							\dashv	+		\vdash		H	H	ł
234.1				NA DIAZ										
				JUANA									Ħ	
222.1		*												
229.1	100	GRAY LIMESTONE WITH HORIZONTAL		CORE	×	REC	+	+		\dashv	+	H	${f H}$	
	102	BORING TERMINATED @ 102'		0	Z	0.4								
	,										\mid	1	Ħ	
		•												
				•										

REMARKS:

DRILLED BY Caribbean ST LOGGED BY MJC CHECKED BY LDW

BORING NUMBER
DATE STARTED

DATE COMPLETED

JOB NUMBER

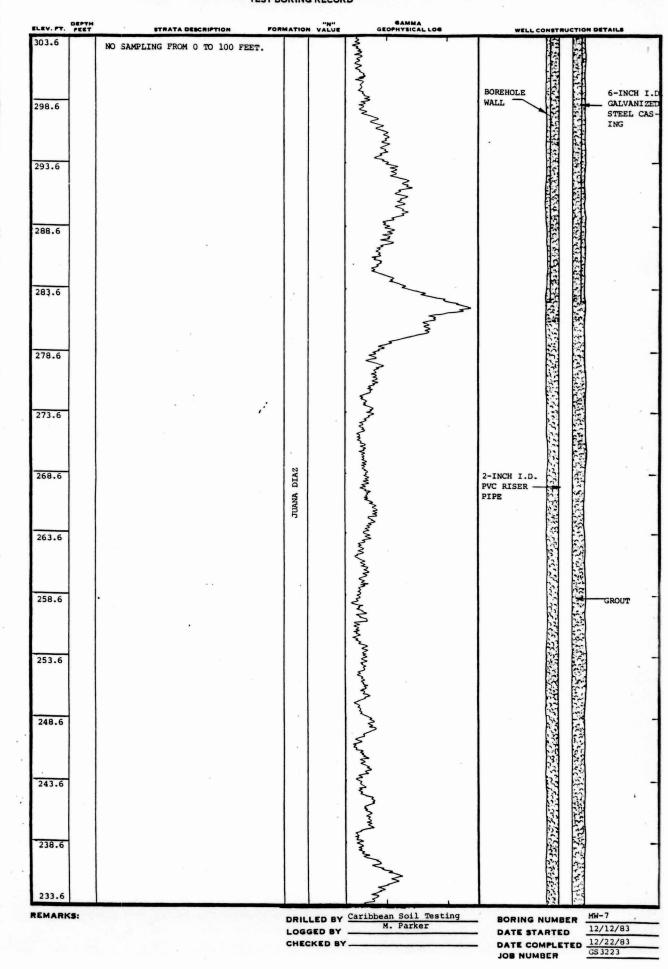
C-88

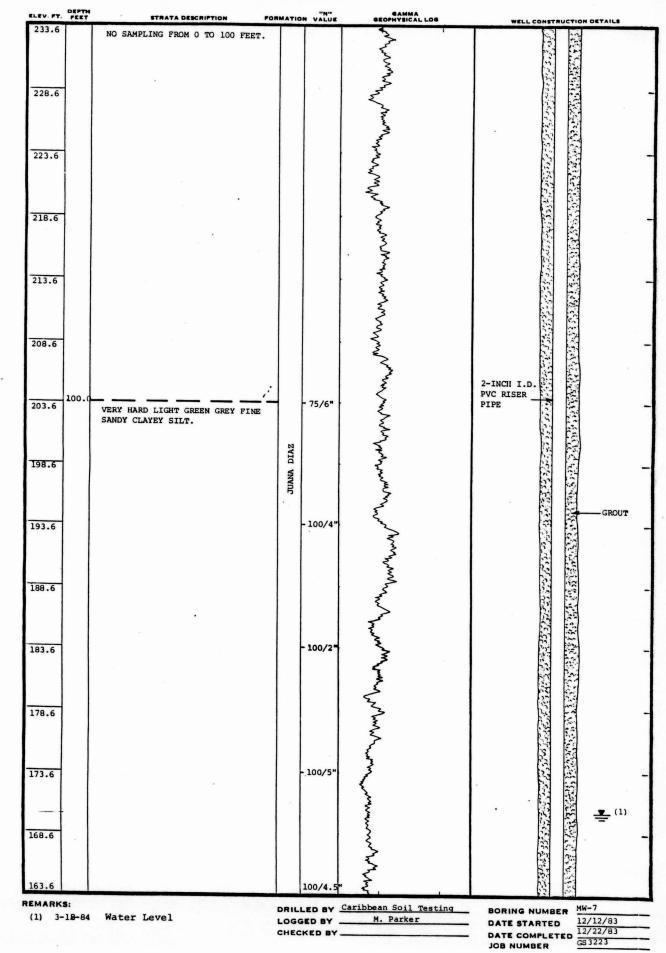
3/15/84

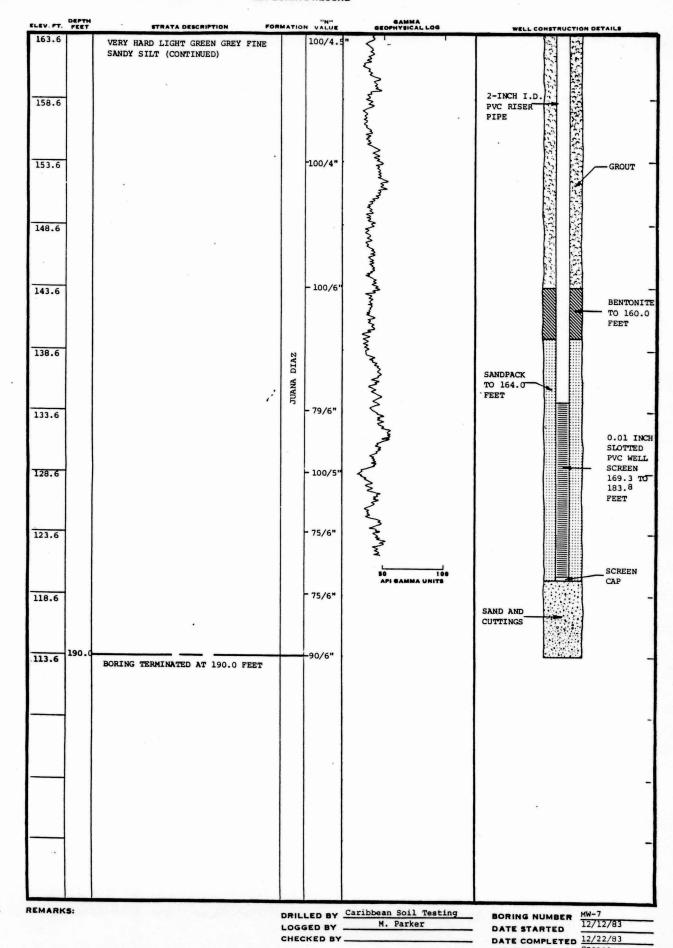
3/19/84

GS 3222.55

ENCLOSURE 20 TEST BORING RECORD







JOB NUMBER GS 32 23
Page 3 of 3